

EXHIBIT A

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 1/3/2006
 Account No.: 5000-040613M
 Statement No.: 29506

ATTN: Clayton E. Bunting, Esq.

Eames v. Nationwide Insurance Company

		HOURS
05/05/2005		
JSS	Drafting of e-mail to defendant re default standard for electronic discovery	0.10
05/11/2005		
JSS	Drafting of e-mail to defendant re deficiency in defendant's response to request for production of documents	0.30
05/12/2005		
JSS	Review of e-mail from defendant re deficiencies in defendant's response to request for production of documents	0.10
05/16/2005		
JSS	Drafting of e-mail to defendant re deficiencies in defendant's response to request for production of documents, re proposed resolution	0.40
05/18/2005		
JSS	Review of e-mail from S. Robinson re scheduling of teleconference with Court re discovery dispute re defendant's response to request for production of documents	0.10
JSS	Drafting of e-mail to defendant re above	0.10
JSS	Review of e-mail from defendant re above	0.10
JSS	Telephone call to Court re alternative dates for teleconference with Court re discovery dispute	0.10
JSS	Drafting of e-mail to defendant re alternative dates for teleconference with Court	0.10
05/19/2005		
HRJ	Telephone call to Cheryl at Judge Jordan's chambers re: teleconference date/time; e-mail J. Spadaro	0.20

05/20/2005

JSS	Exchange of e-mails with H. Jones re arrangements for 6/2/05 teleconference with Court	0.10
JSS	Drafting of e-mail to defendant re efforts to meet and confer re discovery dispute	0.10

05/27/2005

JSS	Preparation of, drafting of correspondence to Court re discovery dispute re defendant's response to request for production of documents (first set)	2.30
HRJ	Instructions from J. Spadaro re: exhibits to letter to Judge Jordan	0.20

05/31/2005

HRJ	Preparation of letter to Judge Jordan with exhibits re: discovery dispute	0.40
JSS	Further drafting of, drafting revisions to correspondence to Court re teleconference re discovery dispute with defendant	0.50

07/19/2005

JSS	Telephone call to Court re re-scheduling of teleconference with Court re discovery dispute re defendant's response to request for production of documents	0.20
JSS	Drafting of e-mails to defendant re above	0.10
JSS	Review of e-mail from defendant re above	0.10
JSS	Drafting of e-mail to defendant confirming agreed date for teleconference with Court	0.10
JSS	Drafting of correspondence to Court re re-scheduling of teleconference with Court re discovery dispute	0.20

07/20/2005

JSS	Review of e-mail from defendant re defendant's lack of recall re discovery dispute	0.10
JSS	Drafting of e-mail to defendant re above	0.30

08/04/2005

JSS	Preparation for oral argument for 8/5/05 teleconference with Court re defendant's deficient response to request for production of documents, including review of outline for oral argument	2.90
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08/05/2005

JSS	Teleconference with Court and defendant re discovery dispute re defendant's documents establishing and explaining offending practice	0.80
JSS	Drafting e-mail to defendant re continued efforts to meet and confer re above	0.30
JSS	Review of e-mail from defendant re above	0.10
JSS	Drafting of e-mail to defendant re defendant's questions re pending request for production of documents	0.20

09/02/2005

JSS	Drafting of correspondence to defendant re continued meet and confer on discovery issues; re proposed meeting re same, etc.	0.60
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09/07/2005

JSS	Review of e-mail from defendant re status of meet and confer on discovery issues	0.10
JSS	Drafting of e-mail to defendant re above	0.30

09/20/2005

JSS	Exchange of e-mails with defendant re its postponement of 9/23/05 meeting	0.20
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09/22/2005

JSS	Drafting of e-mail to defendant re preparation of 10/3/05 meeting on discovery issues, responses to defendant's questions	0.70
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09/30/2005

HRJ	Instructions from J. Spadaro; e-mail C. Cheyney re directions to office for 10/3/05 meeting	0.30
JSS	Preparation for 10/3/05 meeting with defendant on meet and confer re pending discovery, including review of related correspondence to and correspondence from defendant, etc.	0.80

10/03/2005

JSS	Meeting with defendant re meet and confer on pending discovery	0.70
JSS	Drafting correspondence to defendant re results of meet and confer	0.70

10/24/2005

JSS	Drafting of correspondence to defendant re further meet and confer re defendant's response to request for production of documents (first set)	0.50
JSS	Preparation of, drafting of motion to compel re initial request for production of documents, including review of related correspondence, prior hearing transcripts, etc.	2.80

10/25/2005

JSS	Continued drafting of, preparation of opening brief on motion to compel re initial request for production of documents	6.90
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10/26/2005

JSS	Further drafting of, drafting revisions to, finalizing opening brief on motion to compel	3.30
JSS	Instructions to H. Jones re preparation of exhibits to opening brief	0.30
JSS	Drafting of affidavit of H. Jones in support of motion to compel	0.30
JSS	Drafting of motion to compel	0.10
JSS	Drafting of correspondence to SDM re motion to compel and for sanctions	0.20

11/03/2005

JSS	Review of defendant's answering brief to motion to compel and for sanctions	0.30
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11/07/2005

JSS	Preparation of, drafting of reply brief in support of motion to compel and for sanctions, including legal research on burden and privilege objections, etc.	3.90
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11/08/2005

JSS	Further drafting of, preparation of reply brief on motion to compel and for sanctions	5.20
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11/09/2005

JSS	Further preparation of, drafting revisions to and finalizing reply brief on motion to compel and for sanctions	3.80
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11/15/2005

JSS	Review of correspondence from defendant to SDM re request for oral argument on our motion to compel	0.10
JSS	Review of correspondence from SDM re above	0.10

11/29/2005

JSS	Review of e-mail from SDM re scheduling of oral argument on motion to compel and for sanctions	0.10
JSS	Review of e-mail from defendant to SDM re above	0.10
JSS	Drafting of e-mail to SDM re above	0.10
JSS	Review of correspondence from SDM confirming scheduling of oral argument	0.10

12/12/2005

JSS	Review of e-mails from defendant and SDM re revised start time for 12/14/05 hearing	0.10
JSS	Preparation for oral argument on motion to compel and for sanctions, including drafting of outline of oral argument, review of briefs, etc.	3.80

12/14/2005

JSS	Further preparation for oral argument on motion to compel and for sanctions, including drafting revisions to outline of argument, rehearsal of oral argument, etc.	2.10
JSS	Attendance at oral argument on motion to compel and for sanctions before SDM	1.40

Recapitulation

<u>Timkeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
John S. Spadaro	49.50	\$250.00	\$12,375.00
Heather R. Jones	1.10	\$70.00	\$77.00